

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MASSACHUSETTS  
WESTERN DIVISION

LOUD RECORDS, LLC, a Delaware corporation; UMG RECORDINGS, INC., a Delaware corporation; SONY MUSIC ENTERTAINMENT INC., a Delaware corporation; ELEKTRA ENTERTAINMENT GROUP INC., a Delaware corporation; and INTERSCOPE RECORDS, a California general partnership,	)	CIVIL ACTION No. 04-30136-MAP
	)	
	)	
	)	The Hon. Michael A. Ponsor
	)	
	)	
Plaintiffs,	)	
	)	
v.	)	
	)	
LEE THURSTON,	)	
	)	
Defendant.	)	

**DECLARATION OF COLIN J. ZICK IN SUPPORT OF  
PLAINTIFFS' MOTION FOR ENTRY OF DEFAULT JUDGMENT BY THE COURT  
AGAINST LEE THURSTON**

I, COLIN J. ZICK, declare:

1. I am an attorney at law licensed to practice before the Courts of the Commonwealth of Massachusetts and this United States District Court. I am one of the attorneys for Plaintiffs in the above-captioned matter. Unless otherwise stated, I have personal knowledge of the following facts and, if called and sworn as a witness, could and would competently testify thereto.

2. On July 20, 2004, Plaintiffs filed the Complaint.

3. On January 24, 2005, the Clerk of this Court entered the default of Defendant.

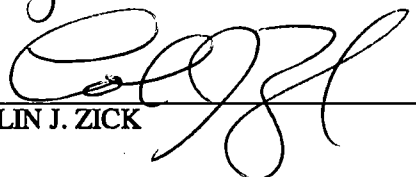
4. Defendant has not appeared in this action. Additionally, before Plaintiffs sought entry of Default, Plaintiffs sent two letters to Defendant warning that Plaintiffs would seek a default judgment if Defendant did not respond to the Complaint. Attached hereto as Exhibit 1 are true and correct copies of those two letters.

5. I am informed and believe that Defendant is not an infant or incompetent person and, after consulting available public databases, is not in the military service.

6. Plaintiffs have incurred costs in this case in the amount of \$196.82.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed this 24th day of February, 2005, at Boston.

  
COLIN J. ZICK